## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankr. No. 15-24752 CMB
JEWEL J. OUTLAW,	)
	) Chapter 13
Debtor.	)
	) Docket No. 88
CITIZEN'S BANK,	) Related to Docket No.
	)
Movant,	) Hearing Date & Time:
	)
VS.	) Claim No. 16
	)
JEWEL J. OUTLAW AND	)
RONDA J. WINNECOUR,	)
CHAPTER 13 TRUSTEE,	)
	)
Respondents.	)

## **DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtor, Jewel J. Outlaw , by and through her attorney, who respectfully represents the following:

- 1. On or about December 31, 2015, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
- 2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
  - 3. Citizen's Bank filed a Notices of Mortgage Payment Change.
- a) The monthly mortgage payment of \$178.44 is being **decreased** to \$172.68 effective 10/28/2020.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Respectfully submitted.

/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtor
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## **CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 6<sup>th</sup> day of October, 2020, by Electronic Filing and U.S. Mail, first class, upon the following:

Ronda J. Winnecour, Esquire Chapter 13 Trustee cmecf@chapter13trusteewdpa.com Citizens Bank Attn: Rachael Elizabeth McGinley Bankruptcy Department One Citizens Bank Way Mail Stop JCA115 Johnston, RI 02919

By: /s/ Rodney D. Shepherd Rodney D. Shepherd Attorney for the Debtor PA I.D. No. 56914 rodsheph@cs.com 2403 Sidney Street Suite 208 Pittsburgh, PA 15203 412 471-9670